



IRA HELLER LAW, LLC

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November 12, 2024

**VIA ECF FILING**

United States Magistrate Judge Stacey D. Adams  
Frank R. Lautenberg U.S. Post Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

Re: John Doe v. Baila Sebrow  
United States District Court, District of New Jersey  
Case No.: 2:21-cv-20706  
**Response to November 8, 2024 Order of the Hon. Judge Adams**

Dear Judge Adams,

As Your Honor is aware, my Law Office represents the Defendant, Ms. Betty Sebrow, in the above referenced matter.

I write this cover letter in response to Your Honor's Order of November 8, 2024, which states as follows:

TEXT ORDER: The Court is in receipt of defense counsel's letter dated November 6, 2024 (ECF No. [127](#)) seeking to supplement the record and oral argument on Defendant's pending motion to amend her answer and counterclaim. This letter was submitted without leave of Court, following oral argument. No supplemental briefing was requested by the Court. The letter is therefore improper and will not be considered by the Court. The Court further notes that, as has occurred multiple times in the past, the attachment to the letter contains Plaintiff's name in violation of the pseudonym order. ECF No. [127](#) shall be temporarily redacted. **Within 7 days, defense counsel shall re-file the letter with all references to Plaintiff's name and personal identifying information redacted (emphasis added).** The Court will address appropriate sanctions, if any, by way of separate order. So Ordered by Magistrate Judge Stacey D. Adams on 11/8/2024. (smf) (Entered: 11/08/2024).

As per my best understanding of the bolded section of Your Honor's Order, I am refileing a copy of my November 6, 2024 letter (annexed to this cover letter), and have refiled the two Exhibits, the first which needed to be refiled due to the redaction oversight. The second exhibit has been refiled as well, as per my best understanding of Your Honor's Order, as highlighted above in bold.

In regard to the first exhibit, the oversight appears on page 6, paragraph #38, in which the Plaintiff's last name was redacted as required but the first name of the Plaintiff was overlooked. This oversight has been corrected accordingly, and I offer my apology and sincere representation that I did my due diligence and the error was absolutely unintentional.

Thanking Your Honor for your kind attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ira Heller", with a large, stylized flourish extending from the end.

Ira W. Heller, Esq.

cc: Daniel Szalkiewicz, Esq.  
*Attorney for Plaintiff*

*Cali Madia, Esq.*  
*Attorney for Plaintiff*



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November 6, 2024

**VIA ECF FILING**

United States Magistrate Judge Stacey D. Adams  
Frank R. Lautenberg U.S. Post Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

Re: John Doe v. Baila Sebrow  
United States District Court, District of New Jersey  
Case No.: 2:21-cv-20706

Dear Judge Adams,

As Your Honor is aware, my Law Office represents the Defendant, Ms. Betty Sebrow, in the above referenced matter.

Subsequent to our hearing of this morning, in which Your Honor stated that you would be issuing an Order in regard to my client's April 12, 2024 motion to amend the counterclaim, I ask Your Honor to point out some crucial information in the documentation before the Court that must be considered.

First, Your Honor had inquired as to why the issue of the sexual assault was not addressed until our amended counterclaim April of 2024. It is therefore extremely pertinent that I point out to Your Honor that in our initial Answer and Counter-Claim filed on behalf of the Defendant on October 3, 2022, in the section beginning on Page 5, in the section labeled "Factual Allegations Common to Counterclaims," Paragraphs 33-36, the sexual assault is specifically referenced. This document (document [13](#)) is currently sealed on the ECF site and is not accessible. I have accordingly redacted the document, and have annexed for Your Honor's reference as **EXHIBIT A**).

Second, in regard to Your Honor's query as to whether there is a defamation claim that goes beyond the litigation privilege, the answer should have been yes and it is mentioned specifically in our Motion to Amend the Answer and Counterclaim. Specifically, I ask Your Honor to reference pages 23, 25 and 26 of the document (or Pages 9, 11 and 12 of the "Proposed Counterclaims section, relevant sections, marked for identification [**EXHIBIT B - document [113](#)]**). I specifically reference the allegations against the Plaintiff of his having made intentionally false statements about the Defendant to the Defendant's friends, clients and professional associates designed to malign her character and damage her professional reputation. It references instances in which the Plaintiff tried to sabotage her job prospects by showing potential employers copies of the filthy text messages he alleged to have received from Ms. Sebrow, some of whom subsequently refused to associate with Ms. Sebrow. Some of these third parties, as a result of Plaintiff's false statements, no longer wanted to associate with Defendant.

I respectfully request that Your Honor please reference the two documents, first the original Answer and Counterclaim of October 3, 2022, and the recent Moton to amend

Counterclaim of April 12, 2024, which first, verify that claim of sexual assault had been alleged early on in this matter, and regarding the recent Motion, that the claim of Defamation are not confined to the parameters of litigation, as presented in the Defendant's Counter-Claims, and the claim should be accordingly accepted.

Thanking Your Honor for your kind attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Ira W. Heller', is written over a light blue rectangular background.

Ira W. Heller, Esq.

cc: Daniel Szalkiewicz, Esq.  
*Attorney for Plaintiff*